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REMARKS

In the final office action mailed 01/18/2005, the Examiner rejected claims 1-20 under 35 U.S.C. §102(b) as allegedly being anticipated by Tyan et al. (U.S. Patent No. 5,893,127).

Since claims 1-20 have been canceled, the rejection of claims 1-20 is moot.

With respect the new claims 21-28, Applicants respectively contend that the new claims herein are not anticipated by Tyan, because Tyan does not teach each and every feature of claims 21-28. For example, Tyan does not teach the following features of independent claim 21 (and similarly of independent claim 26):

“combining the x coordinate of the origin with all of the x coordinates of the cartesian coordinate pairs of all screen display objects of the plurality of screen display objects to form a set of x coordinates arranged in order of ascending numerical value of x;

combining the y coordinate of the origin with all of the y coordinates of the cartesian coordinate pairs of all screen display objects of the plurality of screen display objects to form a set of y coordinates arranged in order of ascending numerical value of y;

eliminating all duplicate x coordinates in the set of x coordinates, resulting in M being the total number of x coordinates in the set of x coordinates;

eliminating all duplicate y coordinates in the set of y coordinates, resulting in N being the total number of y coordinates in the set of y coordinates; ...

for each screen display object of the plurality of screen display objects, using the set of x coordinates and the set of y coordinates to determine M1 contiguous columns and N1 contiguous rows, followed by identifying a cell of the HTML table as an intersection of the M1 contiguous

columns and the N1 contiguous rows".

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In addition, claims 22 and 27 recite, for each block, novel method steps for determining M1 contiguous columns and N1 contiguous rows, the intersection of which is the cell of the HTML table into to which the block is subsequently loaded, namely:

"determining a first column number of the M1 contiguous columns as equal to the number of x coordinates in the set of x coordinates that are less than or equal to the first x coordinate of the screen display object,

determining M1 as equal to the number of x coordinates in the set of x coordinates that are greater than the first x coordinate of the screen display object and less than or equal to the second x coordinate of the screen display object,

determining a first row number of the N1 contiguous rows as equal to the number of y coordinates in the set of y coordinates that are less than or equal to the first y coordinate of the screen display object, and

determining N1 as equal to the number of y coordinates in the set of y coordinates that are greater than the first y coordinate of the screen display object and less than or equal to the second y coordinate of the screen display object".

In addition, claims 23 and 28 recite novel method steps for determining the width of the M columns and the height of the N rows of the HTML table, namely:

"wherin said determining the width of each column of the M columns of the HTML table comprises determining the width of column m by subtracting the mth x coordinate from the

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$(m+1)^{th}$ x coordinate in the set of x coordinates for $m = 1, 2, \dots, M-1$ and setting the width of column M equal to 1, and

whereto said determining the height of each row of the N rows of the HTML table comprises determining the height of row n by subtracting the n^{th} y coordinate from the $(n+1)^{th}$ y coordinate in the set of y coordinates for $n = 1, 2, \dots, N-1$ and setting the height of row N equal to 1."

A fundamental difference between Tyan and claims 21 and 26 of the present invention reflects the fact that Tyan's method of generating the HTML table is based on a logical processing of a hierarchical tree, said hierarchical tree including geometrical blocks (of text, graphics, etc.) to be loaded into an HTML table, said blocks being derived from a bitmap image of a page. A flow chart for the generation and processing of the hierarchical tree is shown FIG. 5 of Tyan, and an example of Tyan's hierarchical tree is shown in the table at the top of column 10 of Tyan. Tyan's hierarchical tree is derived from layout relationships between the blocks based on the relative locations of the blocks in the bitmap image. Tyan classifies the blocks in step S506 in a manner that assigns a block type to each block, based on the layout relationships.

In step S507, Tyan determines a column span number and row span number for the hierarchical tree and assigns the column span and row span to those blocks satisfying pre-specified hierarchical relationships as described in Tyan, col. 12, line 46 - col. 13, line 52. Of the 15 blocks (BLK1, BLK2, ..., BLK15) in the illustrated example in Tyan, the block BLK12 is assigned the determined column span number because BLK12 satisfies the pre-specified hierarchical relationship of being the first great-grandchild whose parent has a horizontal sibling.

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Similarly of the 15 blocks in the illustrated example in Tyan, the block BLK14 is assigned the determined row span number because BLK14 satisfies the pre-specified hierarchical relationship of being the first grandchild that does not have a horizontal sibling. Note that some, but not all, of the blocks in the hierarchical tree are assigned a column span number or a row span number in Tyson's disclosure.

In step S509, Tyan reorders the blocks by making use of the column span and row span blocks determined in step S507, wherein step S509 is outlined in Tyan, col. 13, line 54 - col. 14, line 31.

In step S510, Tyan formats the HTML table in accordance with the reordered blocks determined in step S509, the column and row spans determined in step S507, and the block types determined in step S506.

In summary, Tyan's method employs logic-based processing of a hierarchical tree to generate the HTML table that facilitates display of the blocks on a display device.

In contrast, the methodology of the claims of the present invention is based on processing a set of x coordinates and a set of y coordinates derived from the defining x and y coordinates of all of the blocks to be displayed. Tyan does not generate said set of x coordinates and said set of y coordinates, but instead performs the aforementioned logical tree analysis. Thus, although both the present invention and Tyan generate an HTML table adapted to display geometrical blocks on a page of a display device, the present invention and Tyan each employ a completely different method of generating the HTML table, as reflected in claims 21-28 of the present invention.

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Conclusion

Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or Deposit Account 09-0457.

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